UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THE ALVIN GINDEL REVOCABLE TRUST, and ALVIN GINDEL, in his capacity as Trustee of the Alvin Gindel Revocable Trust,

Defendants.

Adv. Pro. No. 10-04925 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation ("Stipulation") is submitted pursuant to the Bankruptcy Court's Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order ("Case Management Procedures Order").

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including May 31, 2019.

08-01789-cgm Doc 18486 Filed 02/19/19 Entered 02/19/19 13:54:49 Main Document Pg 2 of 3

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures

Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: February 19, 2019

New York, New York

/s/ Nicholas J. Cremona

Baker & Hostetler LLP 45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Dean D. Hunt

Email: dhunt@bakerlaw.com

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

/s/ Arthur H. Ruegger

DENTONS US LLP 1221 Avenue of the Americas

New York, NY 10020 Telephone: (212) 768-6700 Facsimile: (212) 768-6800

Arthur H. Ruegger

Email: Arthur.Ruegger@dentons.com

Attorneys for Defendants

/s/ Deborah A. Reperowitz

Stradley Ronon Stevens & Young, LLP 100 Park Avenue, Suite 2000 New York, NY 10017

Telephone: (212) 812.4138 Facsimile: (646) 682.7180 Deborah A. Reperowitz

Email: dreperowitz@stradley.com

Mediator